

# Sage Legal LLC

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July 24, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Pamela K. Chen, U.S.D.J.  
225 Cadman Plaza East, Courtroom 11D South  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, *et al.***  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Chen:

This office, along with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”), in the above-referenced case.

Plaintiff is once more required to respectfully and urgently request that ECF Docket Entry 568 be immediately removed from the public docket or sealed because Defendants have again filed documents that contain Plaintiff’s trade secrets. Specifically, pages 52-53,<sup>1</sup> 69, and 96-97 contain Plaintiff’s confidential information and trade secrets which it respectfully requests be sealed.

Due to the highly sensitive nature of the information disclosed – which Defendants were previously ordered to return and destroy (see, e.g., ECF Nos. 66-1, 254-1) – Plaintiff also respectfully requests that the Court waive the formal motion requirement under these circumstances, especially in light of this Court’s prior Orders granting motions to seal the same information. See Text Only Orders dated February 28, 2022 and July 31, 2024. Defendants’ inclusion of this confidential material is not only a blatant violation of prior court orders but appears to be a calculated act of bad faith, which is shocking and unsurprising at the same time given Defendants’ demonstrated disregard for the rule of law over the course of these proceedings. Notably, ECF Docket Entry 568 contains information that Defendants were previously ordered to return to Defendants and destroy. *See e.g.* ECF Docket Entries [66-1](#)<sup>2</sup>, [254-1](#).<sup>3</sup>

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<sup>1</sup> In its July 23, 2025 Order at 3:54 PM, this Court noted that pages 52-53 of Defendants’ submission contain confidential information.

<sup>2</sup> Ordering Defendants to “destroy[] any documents, whether in hard copy and/or computerized and/or other electronic media format, that are presently in Defendants’ personal or corporate possession relating to ... IME Watchdog, Inc., or any other matter relevant to this case.”

<sup>3</sup> Directing Defendants to return to Plaintiff “all originals and copies of documents, records, and information, whether in hard copy and/or computerized and/or other electronic media form, that contain Plaintiff’s trade secrets, and confidential and proprietary information, in the nature of Plaintiff’s: ... customer names.”

Plaintiff thanks the Court for its continued time and attention to this case and respectfully awaits further direction.

Dated: Lake Success, New York  
July 24, 2025

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

Dated: Jamaica, New York  
July 24, 2025

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: Safa Gelardi (via ECF)

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